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Attorney for Plaintiffs

MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARC J. RANDAZZA, an individual,)	Case No. 2:12-cv-02040-GMN-PAL
JENNIFER RANDAZZA, an individual, and)	
NATALIA RANDAZZA, a minor,)	OPPOSITION TO DEFENDANT
)	CRYSTAL COX'S MOTION FOR
Plaintiffs,)	INSURANCE DOCUMENTATION
)	
vs.)	
)	
CRYSTAL COX, an individual, and ELIOT)	
BERNSTEIN, an individual,)	
)	
Defendants.)	

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit their Opposition to Defendant Crystal Cox's Motion for Insurance Documentation (ECF 115).

In her Motion, Cox requests "any insurance under which Randazza Legal Group is operating" (ECF 115 at 1). First, Randazza Legal Group is not a party to the instant suit; therefore, Cox has no basis for requesting this information, which is completely irrelevant to Plaintiffs' claims or Ms. Cox's defenses to those claims.

Furthermore, discovery has not commenced in this case because Cox has refused to speak with Plaintiffs' counsel via telephone or in person, despite Plaintiffs' requests to set up an early case conference pursuant to Rule 26(f) of the Federal Rules of Civil Procedure (ECF 82). Not only

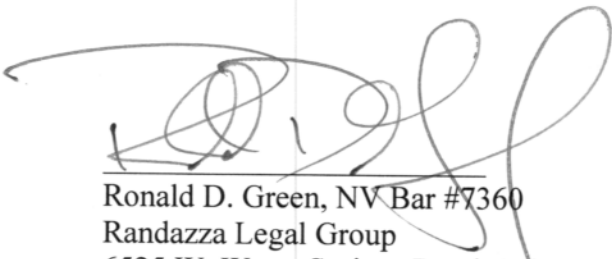
1 has Cox refused to respond to Plaintiffs' requests to set up a Rule 26(f) conference, she also filed a
 2 Motion for a Protective Order due to Plaintiffs' counsel's attempt to comply with the Federal Rules
 3 of Civil Procedure and the rules of this court (See ECF 47 at 3, "Ronald D. Green, Randazza Legal
 4 Group insists on phone conference, a meeting regarding 'discovery', Defendant Crystal Cox
 5 refuses to allow him access to her in ANY way.").

6 If Ms. Cox would like to obtain discovery from Plaintiffs, she should be required to follow
 7 the procedures set forth by Fed. R. Civ. P. 26(f). Because Randazza Legal Group is not a party and
 8 because its insurance policies are completely irrelevant to this case, Plaintiffs' counsel would
 9 decline to produce information regarding the firm's insurance coverage. If Ms. Cox had issues
 10 with that refusal, she could make a motion to compel before the magistrate judge. Instead, Cox is
 11 once again attempting to circumvent proper court procedure. Cox's flagrant refusal to abide by the
 12 rules of this Court and flood the docket with improper requests for relief further demonstrates the
 13 need to revoke her electronic filing privileges (ECF 69).

14 Defendant Cox is not a plaintiff in this case, and Randazza Legal Group is not a party. Cox
 15 has no claims for relief against any of the Plaintiffs and provides nothing to support her Motion.
 16 Furthermore, the Court already has instructed Ms. Cox that she may not file documents related to
 17 *Cox v. Randazza*, Case No. 2:13-cv-00297-JCM-VCF, in this action (ECF 109). Her Motion
 18 appears to be tailored to that case, where it would still be improper, as she has not even bothered to
 19 serve process on any of the Defendants in that action. For the foregoing reasons, Plaintiffs
 20 respectfully request the Court deny Defendant Cox's Motion for Insurance Documentation.

21 Dated: April 26, 2013

Respectfully submitted,

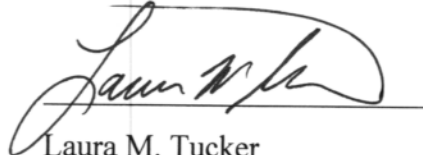
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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was filed using this Court's CM/ECF system on April 24, 2013.

Dated: April 26, 2013

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Laura M. Tucker", is written over a horizontal line.

Laura M. Tucker

Law Clerk

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